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December 3, 2015

BY ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Galanis et al., No. 15 Cr. 643 (PKC)

Dear Judge Castel:

We respectfully submit this letter on behalf of Defendant John Galanis regarding the conference scheduled for December 8, 2015, at which the Curcio hearing that was commenced on November 9 is scheduled to conclude.

As Your Honor may recall, at the hearing on November 9, Mr. Galanis represented to the court that he believed he would be able to secure funds necessary to retain non-conflicted defense counsel by the time of the upcoming conference on December 8. Mr. Galanis has reached an agreement with such an attorney, Gerald Lefcourt, to represent him in connection with this matter, and we have spoken with Mr. Lefcourt to confirm that this is indeed the case.

However, the assets with which Mr. Galanis proposes to initially retain Mr. Lefcourt are illiquid, and the process of liquidating them has proven to be more lengthy than expected. Mr. Galanis expects at this time that the funds should be available, and the Mr. Lefcourt will be retained, by sometime during the third or fourth week in December.

We inform the Court of this delay so as not to interfere with Your Honor's schedule or waste the Court's time on the 8th. Should Your Honor wish to conclude the Curcio hearing before Mr. Lefcourt is properly retained, Mr. Galanis has authorized us to

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inform the Court that, with the Court's permission, he would consent to proceed pro se during the Curcio hearing for the purpose of resolving the potential conflict issues to be addressed therein.

Should Your Honor have any questions in connection with this application, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Paul R. Grand".

Paul R. Grand

cc: AUSA Brian Blais (via email)